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6 *Attorneys for Defendant Coinbase, Inc.*

7

8 **UNITED STATES DISTRICT COURT**  
 9 **DISTRICT OF NEVADA**

10 KENNETH LIEBSCHER, an individual,

11 Plaintiff,

12 v.

13 COINBASE, INC., a Delaware corporation;  
 14 Does I through X, inclusive; and ROE  
 ENTITIES XI through M, inclusive,

15 Defendant.

16 Case No. 2:24-CV-00148-RFB-EJY

**JOINT STIPULATION TO DISMISS  
 WITHOUT PREJUDICE**

17 COME NOW Plaintiff Kenneth Liebscher (“Plaintiff”) and Defendant Coinbase, Inc.  
 18 (“Coinbase”) (collectively, the “Parties”), by and through their undersigned counsel, and hereby  
 19 submit this joint stipulation for dismissal without prejudice, stating as follows:

20 1. On August 28, 2023, Plaintiff filed suit against Coinbase in the Eighth Judicial  
 21 District Court in and for Clark County, State of Nevada. *See ECF No. 1-1.*

22 2. On January 22, 2024, Coinbase removed this case to this Court. *See ECF No. 1.*

23 3. The Parties agree to dismiss all of Plaintiff’s claims against Defendant Coinbase  
 24 without prejudice.

25 4. The Parties further stipulate that each Party shall bear its own attorneys’ fees and  
 26 costs incurred in this action.

27 5. The Parties further stipulate that this case is concluded and may be closed.

28 / / /

1 WHEREFORE, the Parties therefore respectfully request that this Court enter an order  
2 granting this joint stipulation and dismissing this case without prejudice.

3 SO STIPULATED this 29<sup>th</sup> day of October, 2024.  
4

5 /s/ Brittni A. Tanenbaum  
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5 /s/ Byron Thomas  
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8 *Attorneys for Plaintiff*

12 **ORDER**

13 **IT IS SO ORDERED.**



14  
15 RICHARD F. BOULWARE, II  
16 UNITED STATES DISTRICT JUDGE  
17

18 DATED this 30 day of October 2024.  
19

20 3993 Howard Hughes Parkway, Suite 600  
21 Las Vegas, NV 89169

22 **LEWIS ROCA**  
23

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 29th day of October, 2024, a true and correct copy of the foregoing **JOINT STIPULATION TO DISMISS WITHOUT PREJUDICE** was electronically filed with the Clerk of Court using the ECF electronic filing system, which automatically serves all counsel of record.

/s/ Lisa M. Noltie  
An employee of Lewis Roca Rothgerber Christie

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**LEWIS ROCA**